

Exhibit 1

From: Esha Bandyopadhyay
Sent: Tuesday, April 05, 2022 12:50 PM
To: Ari Rafilson; Michael Shore; FR Service-Xilinx/FG SRC; Warren Mabey, Jr.; Bryan Basso; David Hoffman; Ashley Bolt; stamoulis@swdelaw.com; weinblatt@swdelaw.com
Cc: TeamFGSRC_Xilinx@shorechan.com
Subject: RE: 1:20-cv-00601-LPS; FG SRC LLC v. Xilinx, Inc. - Service Email

Ari & Stam-

Here is the Zoom info: <https://fish.zoom.com/j/7256357566>.

We will speak to you at 12:30pm Pacific.

Best regards,
Esha

Esha Bandyopadhyay :: 650 839 5088 direct :: 650 704 3443 mobile

From: Ari Rafilson <arafilson@shorechan.com>
Sent: Tuesday, April 5, 2022 7:32 AM
To: Esha Bandyopadhyay <esha@fr.com>; Michael Shore <mshore@shorechan.com>; FR Service-Xilinx/FG SRC <FRService-Xilinx/FGSRC@fr.com>; Warren Mabey, Jr. <mabey@fr.com>; Bryan Basso <basso@fr.com>; David Hoffman <Hoffman@fr.com>; Ashley Bolt <bolt@fr.com>; stamoulis@swdelaw.com; weinblatt@swdelaw.com
Cc: TeamFGSRC_Xilinx@shorechan.com
Subject: RE: 1:20-cv-00601-LPS; FG SRC LLC v. Xilinx, Inc. - Service Email

Esha,

We are available to confer today at 2:30 CST. Please circulate a dial-in or let us know if you prefer that we do so.

Best Regards,

Ari

From: Esha Bandyopadhyay <esha@fr.com>
Sent: Monday, April 4, 2022 7:19 PM
To: Ari Rafilson <arafilson@shorechan.com>; Michael Shore <mshore@shorechan.com>; FRService-Xilinx/FGSRC@fr.com>; Warren Mabey <mabey@fr.com>; Bryan Basso <basso@fr.com>; David Hoffman <Hoffman@fr.com>; Ashley Bolt <bolt@fr.com>; Stamatios Stamoulis <stamoulis@swdelaw.com>; Richard Weinblatt <weinblatt@swdelaw.com>
Cc: Team FG SRC/Xilinx <TeamFGSRC_Xilinx@shorechan.com>
Subject: RE: 1:20-cv-00601-LPS; FG SRC LLC v. Xilinx, Inc. - Service Email

CAUTION: External Email!

Ari- We do not believe SRC's approach of serving an RFA with respect to each and every document produced by Xilinx is consistent with the spirit of the Scheduling Order or with Rule 26. We believe the parties are at an impasse and this issue is ripe for a telephonic meet and confer. Please let us know your availability tomorrow, April 5th. This is our third request; if you do not provide your availability, we will assume that SRC is refusing to meet and confer.

Regards,
Esha

Esha Bandyopadhyay :: 650 839 5088 direct :: 650 704 3443 mobile

On April 4, 2022 at 12:58:01 PM PDT, Ari Rafilson <arafilson@shorechan.com> wrote:

Esha,

As the agreed Scheduling Order states, “”[t]here is ***no limit*** on the number of requests for admission the parties may serve to establish the authenticity of documents.” Moreover, in my service email I provided Xilinx with an offer to mitigate any alleged burden:

If Xilinx is willing to stipulate to authenticity of all documents produced by it, it need not reply otherwise to individual RFAs for authenticity. Such a stipulation would not affect Xilinx's ability to contend that a document is inadmissible for reasons other than authenticity. If Xilinx is willing to enter into this stipulation, FG SRC is willing to reciprocate in kind.

This offer stands. To the extent Xilinx does not wish to so stipulate please provide for our consideration, before the parties schedule a meet and confer, support for your allegation that FG SRC's RFAs for authenticity are improper in light of (1) Xilinx's express agreement that there is ***no limit*** to the number of RFAs that may be served for authenticity and (2) FG SRC's offer to minimize any alleged burden.

Best Regards,

Ari

From: Esha Bandyopadhyay <esha@fr.com>
Sent: Monday, April 4, 2022 2:57 PM
To: Michael Shore <mshore@shorechan.com>; Ari Rafilson <arafilson@shorechan.com>; FRService-Xilinx/FGSRC@fr.com; Warren Mabey <mabey@fr.com>; Bryan Basso <basso@fr.com>; David Hoffman <Hoffman@fr.com>; Ashley Bolt <bolt@fr.com>; Stamatios Stamoulis <stamoulis@swdelaw.com>; Richard Weinblatt <weinblatt@swdelaw.com>
Cc: Team FG SRC/Xilinx <TeamFGSRC_Xilinx@shorechan.com>
Subject: RE: 1:20-cv-00601-LPS; FG SRC LLC v. Xilinx, Inc. - Service Email

CAUTION: External Email!

Michael- Thank you for letting us know SRC's position.
Stam- Please let us know your availability tomorrow, April 5th, to meet and confer on this issue.

Regards,
Esha

Esha Bandyopadhyay :: 650 839 5088 direct :: 650 704 3443 mobile

From: Michael Shore <mshore@shorechan.com>

Sent: Monday, April 4, 2022 10:47 AM

To: Esha Bandyopadhyay <esha@fr.com>; Ari Rafilson <arafilson@shorechan.com>; FR Service-Xilinx/FG SRC <FRService-Xilinx/FGSRC@fr.com>; Warren Mabey, Jr. <mabey@fr.com>; Bryan Basso <basso@fr.com>; David Hoffman <Hoffman@fr.com>; Ashley Bolt <bolt@fr.com>

Cc: TeamFGSRC_Xilinx@shorechan.com

Subject: RE: 1:20-cv-00601-LPS; FG SRC LLC v. Xilinx, Inc. - Service Email

Esha,

The way to resolve this concern is to stipulate to the authenticity of the documents Xilinx produced.

Michael

From: Esha Bandyopadhyay <esha@fr.com>

Sent: Monday, April 4, 2022 12:23 PM

To: Ari Rafilson <arafilson@shorechan.com>; FRService-Xilinx/FGSRC@fr.com; Warren Mabey <mabey@fr.com>; Bryan Basso <basso@fr.com>; David Hoffman <Hoffman@fr.com>; Ashley Bolt <bolt@fr.com>

Cc: Team FG SRC/Xilinx <TeamFGSRC_Xilinx@shorechan.com>

Subject: RE: 1:20-cv-00601-LPS; FG SRC LLC v. Xilinx, Inc. - Service Email

CAUTION: External Email!

Ari (and Stam)-

Serving 23,688 RFAs is plainly absurd. Please withdraw these RFAs by the close of business or let us know your availability tomorrow, April 5th, to meet and confer on this issue.

Regards,
Esha

Esha Bandyopadhyay :: 650 839 5088 direct :: 650 704 3443 mobile

From: Ari Rafilson <arafilson@shorechan.com>

Sent: Friday, April 1, 2022 2:56 PM

To: FR Service-Xilinx/FG SRC <FRService-Xilinx/FGSRC@fr.com>; Warren Mabey, Jr. <mabey@fr.com>; Esha Bandyopadhyay <esha@fr.com>; Bryan Basso <basso@fr.com>; David Hoffman <Hoffman@fr.com>; Ashley Bolt <bolt@fr.com>

Cc: TeamFGSRC_Xilinx@shorechan.com

Subject: 1:20-cv-00601-LPS; FG SRC LLC v. Xilinx, Inc. - Service Email

[This email originated outside of F&R.]

Counsel,

Attached for service (via the ShareFile URL below) please see Plaintiff's First RFAs for Authenticity. If Xilinx is willing to stipulate to authenticity of all documents produced by it, it need not reply otherwise to individual RFAs for authenticity. Such a stipulation would not affect Xilinx's ability to contend that a document is inadmissible for reasons other than authenticity. If Xilinx is willing to enter into this stipulation, FG SRC is willing to reciprocate in kind.

Please use the following ShareFile link: <https://shorechan.sharefile.com/d-s182a19cdec614d36a123a117f6cbf2a5>.

Best Regards,

Ari Rafilson
Partner
Shore Chan LLP
Bank of America Plaza
901 Main Street, Suite 3300, Dallas, Texas 75202
214-593-9114 (Direct) | 214-593-9110 (Firm)
www.shorechan.com



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